

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Maria Mora-Villalpando,

Plaintiff,

v.

U.S. Immigration and Customs Enforcement,  
U.S. Customs and Border Protection, and U.S.  
Citizenship and Immigration Services,

Defendants.

No. C18-655-JLR

JOINT STATUS REPORT

The parties hereby file this Joint Status Report as required by the Court's Order on the parties' previous joint status report (Dkt. #54). The Court ordered the parties to provide a joint status report within two months concerning their progress with the Court's rulings.

U.S. Immigration and Customs Enforcement ("ICE") has conducted initial searches of the Office of Principal Legal Advisor ("OPLA") Case Management System ("OCMS PLANet"). The parties have discussed those results and agreed to a set of search terms. Therefore, ICE will conduct searches of the database based on the agreed upon search terms.

Joint Status Report  
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UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 In addition, U.S. Customs and Immigration Services ("USCIS") will conduct a search of  
2 the EDMS database for copies of I-213s created on or after January 20, 2017 once search terms  
3 are agreed upon. The parties are continuing to negotiate search terms. Once search terms are  
4 agreed upon, USCIS will conduct the search and ICE will review documents prior to production.

5 The parties have agreed that all searches will involve the time frame of January 20, 2017  
6 to the present.

7 To keep the Court apprised, the parties will provide the Court with another Joint Status  
8 Report within 60 days of this Joint Status Report, unless the Court orders otherwise.

9 Dated this 25<sup>th</sup> day of November, 2019.

11 /s/ Khaled Alrabe

12 Khaled Alrabe, NY Bar Reg. 5542311 (admitted  
*pro hac vice*)

13 NATIONAL IMMIGRATION PROJECT  
14 OF THE NATIONAL LAWYERS GUILD  
89 South St. Suite 603  
Boston, MA 02111  
Ph. (617) 412-6794  
15 Em. [khaled@nipnlg.org](mailto:khaled@nipnlg.org)

16 /s/ Devin T. Theriot-Orr

17 Devin T. Theriot-Orr, WSBA #33995  
OPEN SKY LAW, PLLC  
20415 72nd Ave. S., Ste. 110  
18 Kent, WA 98032  
Ph. (206) 962-5052  
19 Fax (206) 681-9663  
Em. [devin@opensky.law](mailto:devin@opensky.law)

1 BRIAN T. MORAN  
2 United States Attorney

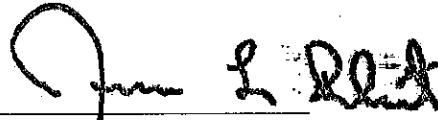
3 s/ Brian C. Kipnis  
4 BRIAN C. KIPNIS

5 s/ Sarah K. Morehead  
6 SARAH K. MOREHEAD, WSBA #29680  
7 Assistant United States Attorneys  
8 Office of the United States Attorney  
9 Suite 5220, United States Courthouse  
10 700 Stewart Street  
11 Seattle, Washington 98101-1271  
12 Phone: 206-553-7970  
13 Fax: 206-553-4073  
14 Email: brian.kipnis@usdoj.gov  
15 Email: sarah.morehead@usdoj.gov  
16  
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ORDER

The parties will submit another joint status report within 60 days of the date of this order.

Dated this 26th day of November, 2019.



James L. Robart  
United States District Judge